

REQUIRED STATEMENT TO ACCOMPANY
ALL MOTIONS TO MODIFY STAY

All Cases: Debtor(s) Tharon Bradley

Case No. 18-16173

Chapter 13

All Cases: Moving Creditor U.S. Bank National Association, as
Trustee for HarborView Mortgage Loan Trust 2006-4, Mortgage
Loan Pass-Through Certificates, Series 2006-4

Date Case Filed June 6, 2018

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☒ Other (describe) Dismissal

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed August 28, 2018

1. Collateral
 - a. Home 4600 Blarney Drive, Matteson, IL 60443
 - b. Car Year, Make and Model _____
 - c. Other (describe) _____
2. Balance owed as of September 6, 2019 is \$ 524,739.07
Total of all other liens including collateral \$0.00
3. In chapter 13 cases, attach a payment history listing the amount and dates of all payments received from the debtor(s) post-petition:
4. Estimated Value of Collateral (must be supplied in **all** cases) \$ 318,350.00
5. Default
 - a. Pre-Petition Default
Number of months _____ Amount \$ _____
 - b. Post-Petition Default
 - i. On direct payments to the moving creditor
Number of months 2 Amount \$2,960.33 plus attorney fees and costs incurred in connection with this motion
 - ii. On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount \$ _____
6. Other Allegations
 - a. Lack of Adequate Protection § 362 (d) (1)
 - i. No Insurance _____
 - ii. Taxes Unpaid _____ Amount \$ _____
 - iii. Rapidly depreciating asset _____
 - iv. Other (describe) _____
 - b. No Equity and not Necessary for an Effective Reorganization § 362 (d) (2) _____
 - c. Other "Cause" § 362 (d) (1) _____
 - i. Bad Faith (describe) _____
 - ii. Multiple filings _____
 - iii. Other (describe) _____
 - d. Debtor's Statement of Intention regarding the collateral
 - i. ☐ Reaffirm
 - ii. ☐ Redeem
 - iii. ☐ Surrender
 - iv. ☒ No Statement of Intention Filed

Date: September 16, 2019

/s/ Michael N. Burke
Counsel for Movant